

REMARKS

I. Examiner Interview Summary

Applicant acknowledges, with appreciation, the opportunity for the telephonic interview conducted on October 14, 2010, between Examiner Shiu and Applicant's representatives, Linda J. Thayer (Reg. No. 45,681) and the undersigned. During the interview, Applicant proposed some claims amendments and explained the differences between the cited references and the claimed invention. Applicant's proposed claim amendments are reflected in the amendments of claims 1, 23, and 45, and the substance of Applicant's explanations are reflected in the remarks below. The following remarks also reflect Applicant's response to the Examiner Interview Summary, mailed on October 26, 2010.

II. Status and Disposition of the Claims

Claims 1-11, 13, 15-33, 35, and 37-48, of which claims 1, 23, and 45 are independent, are pending and under examination. The Final Office Action¹ took the following actions:

- 1) Rejected claims 11 and 33 under 35 U.S.C. 112, second paragraph;
- 2) Rejected claims 1-3, 6, 8, 10, 11, 13, 15, 18, 20, 22-25, 28, 30, 32, 33, 35, 37, 40, 42, and 44-47 under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent Publication No. 2003/0206717 by Yogeshwar et al. (hereinafter "Yogeshwar") in view of U.S. Patent Publication No. 2004/0032860 by Mundra et al. (hereinafter "Mundra") and U.S. Patent Publication No. 2002/0023261 by Goodwin et al. (hereinafter "Goodwin");
- 3) Rejected claims 4, 5, 16, 17, 26, 27, 38, and 39 under 35 U.S.C. § 103(a) as being unpatentable over *Yogeshwar* in view of *Mundra* and U.S. Patent No. 6,615,212 by Dutta et al. (hereinafter "Dutta");
- 4) Rejected claims 7, 21, 29, and 41 under 35 U.S.C. § 103(a) as being unpatentable over *Yogeshwar* in view of *Mundra* and U.S. Patent Publication No. 2003/0014617 by Tamboli et al. (hereinafter "Tamboli"); and

¹ The Final Office Action contains a number of statements reflecting characterizations of the cited art and the claims. Regardless of whether any such statement is identified herein, Applicant declines to automatically subscribe to any statement or characterization in the Final Office Action.

- 5) Rejected claims 9, 21, 31, 43, and 48 under 35 U.S.C. § 103(a) as being unpatentable over *Yogeshwar* in view of *Mundra* and U.S. Patent No. 6,826,597 by Lonnroth et al. (hereinafter “*Lonnroth*”).

II. Amendments to the Claims

Applicant amends claims 1, 11, 23, 33, 45, and 46. The Amendments are supported by Applicant’s specification at, for example, paragraphs [032], [033], [042], [051], and [052]. No new matter is introduced by the amendments.

III. Response to Rejections

A. Claim Rejections under 35 U.S.C. § 112

The Final Office Action, on page 2, rejected claims 11 and 33 under 35 U.S.C. § 112, second paragraph, as being indefinite. Applicant notes that the rejection is identical to a rejection made in the Office Action dated March 15, 2010, and is apparently based on claim language that was amended in Applicant’s response of June 7, 2010. Applicant, thus, contends that the rejection has already been addressed and respectfully requests clarification or withdrawal of the rejection.

B. Claim rejections under 35 U.S.C. § 103(a)

Applicant requests reconsideration and withdrawal of the rejection of pending claims under 35 U.S.C. § 103(a), because the Final Office Action has not established a *prima facie* case of obviousness.

The Final Office Action has not properly resolved the *Graham* factual inquiries, the proper resolution of which is the requirement for establishing a framework for an objective obviousness analysis. *See M.P.E.P. § 2141(II)*, citing to *Graham v. John Deere Co.*, 383 U.S. 1, 148 USPQ 459 (1966), as reiterated by the U.S. Supreme Court in *KSR International Co. v. Teleflex Inc.*, 550 U.S. 398, 82 USPQ2d 1385 (2007). Here, as detailed below, a *prima facie*

case of obviousness has not been established, because the scope and content of the prior art has not been properly determined, nor have the differences between the claimed invention and the prior art been properly ascertained.

Independent Claims 1, 23, and 45

The Final Office Action, on page 3, rejected independent claims 1, 23, and 45 under 35 U.S.C. § 103(a) as being unpatentable over *Yogeshwar* in view of *Mundra* and *Goodwin*. Applicant respectfully traverses the rejection because *Yogeshwar*, *Mundra*, and *Goodwin*, whether considered separately or in any combination, do not teach or suggest every feature of claims 1, 23, or 45. For example, *Yogeshwar*, *Mundra* and *Goodwin* do not teach or suggest a computer-implemented method which comprises:

storing, in [a] memory, the client-translation code association information including first information that indicates an association between a first translation code and one client of the plurality of clients . . .;

....
automatically detecting a change . . . indicating that the one client requires a second data format different from the first data format;

....
automatically generating a second translation code for data translation to the second data format; and
replacing, in the client-translation code association information stored in the memory, the first information with a second information that indicates an association between the second translation code and the one client,

as recited in claim 1. Examples of the above underlined features are described in Applicant's specification² at paragraphs [032], [033], [042], [051], and [052], and in the detailed description of Figs. 2 and 3.

In its rejection of claim 1 on pages 3-4, the Final Office Action asserted that, of all elements of claim 1, *Yogeshwar* only "does not clearly disclose detecting a [change] during an

² References to Applicant's specification are exemplary in nature and in no way intended to limit the scope of the claims.

exchange of information with the specific client, the change indicating that the specific client requires a second data format different from the first data format,” and to supply the missing elements, the Final Office Action relied on *Mundra*. Applicant, however, contends that *Yogeshwar* is missing more than the Final Office Action realized, and that *Mundra* and *Goodwin* do not supply the missing elements. In particular, *Yogeshwar* does not disclose the above underlined features of claim 1.

Yogeshwar is directed to archival storage, indexing, and retrieving audio/video (A/V) information. See *Yogeshwar* at Abstract. In its rejection of claim 1 on pages 3-4, the Final Office Action cited sections of *Yogeshwar*, which describe a transcoder. In *Yogeshwar*, however, the transcoder at most encodes retrieved A/V material based on information provided by a user. See *Yogeshwar* at [0145]. Nowhere does *Yogeshwar* teach or suggest that its system stores a first information indicating an association between a first translation code and one client of a plurality of clients, or replaces, in the client-translation code association information stored in the memory, the first information with a second information indicating an association between a second translation code and the one client, in the manner recited in claim 1.

Mundra and *Goodwin* do not cure the above deficiencies of *Yogeshwar*. *Mundra* is directed to a “technique to change a codec in realtime during transmission of a voice over packet call placed over a packet switched network, such as the Internet.” *Mundra* at Abstract. In sections that were cited by the Final Office Action, *Mundra* merely describes changing a codec during a call transmission upon a request by the user to improve the quality of the call. *Id.* at [0010]; See also *Id.* at [0010] and [0020]. Moreover, the Final Office Action, on page 5, cited *Goodwin* for its disclosure of multiple translation files used for translation of source code. See *Goodwin* at [0063] and [0101]. *Mundra* and *Goodwin*, however, at least do not teach or suggest

the above-mentioned features regarding storing the first information, and replacing the first information with the second information, in the manner recited in claim 1.

Independent claims 23 and 45 each recite elements similar to those discussed above in relation to claim 1. Thus, for at least the above reasons, claims 1, 23, or 45 are patentable over *Yogeshwar, Mundra, and Goodwin*.

Dependent claims

Each of claims 2-11, 13, 15- 22, 24-33, 35, 37-44, and 46-48 depends from, and thus incorporates elements of, one of claims 1, 23, and 45. The Final Office Action, on pages 6-11, rejected the above claims under 35 U.S.C. § 103(a). In each rejection, the Final Office Action relied on *Yogeshwar, Mundra, and Goodwin* for teaching the features recited in claims 1, 23, or 45, and further relied on *Dutta, Tamboli*, or *Lonnroth* for teaching additional features recited in the rejected claims. Regardless of whether *Dutta, Tamboli*, or *Lonnroth* teach or suggest those additional features, which Applicant does not concede, *Dutta, Tamboli*, and *Lonnroth*, do not cure the deficiencies of *Yogeshwar, Mundra, and Goodwin*. That is, *Dutta, Tamboli*, and *Lonnroth*, whether considered alone or in any combination with *Yogeshwar, Mundra, and Goodwin*, for example, do not teach or suggest a computer-implemented method which comprises:

storing, in [a] memory, the client-translation code association information including first information that indicates an association between a first translation code and one client of the plurality of clients ...;

....
automatically detecting a change ... indicating that the one client requires a second data format different from the first data format;

....
automatically generating a second translation code for data translation to the second data format; and
replacing, in the client-translation code association information stored in the memory, the first information with a second information that indicates an association between the second translation code and the one client,

as recited in claim 1.

Therefore, for at least the above reasons, claims 2-11, 13, 15- 22, 24-33, 35, 37-44, and 46-48 are also patentable over the cited references.

V. Conclusion

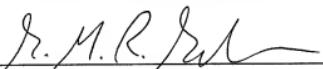
In view of the foregoing remarks, Applicant respectfully requests reconsideration of this application and the timely allowance of the pending claims.

In order to advance prosecution, and if there are any remaining issues or misunderstandings, Applicant respectfully requests the Examiner telephone the undersigned representative to discuss them.

Respectfully submitted,

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